

## CONTINGENCY PLAN REQUIREMENTS

### **EMERGENCY PROCEDURES**

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

i. The location and layout of the facility?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

iii. Places where facility personnel will normally be working?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

iv. Entrances to and roads inside the facility?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

v. Evacuation routes as depicted in Section G of the permit application?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### EMERGENCY AUTHORITIES

3. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so, Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13.(b)] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
4. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**Note:** Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

## IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, *0009 May 2011 Aug 2012* Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Within 15 days of the incident did the permittee submit, to the director, a written report of the incident? If so, Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] *Note: See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.23.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## REMARKS

### CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Has the permittee amended the closure plan? If so, Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** Also see RECORDKEEPING REQUIREMENTS (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

### CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_
- a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Did the permittee carry out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31.] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32.] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33.] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**REMARKS**

**REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES**

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee **not** store incompatible waste **except** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Are all containers of aqueous hazardous acids (ph  $\leq$  2) and caustics ph  $\geq$  12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
7. Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
8. As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**REMARKS**

### **STORAGE OF HAZARDOUS WASTES IN CONTAINERS**

**NOTE:** The requirements of permit Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for < 90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with < 90-day accumulation of wastes.

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326? [Condition C.1.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]

3. When accumulating waste within the permitted X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_



### CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
9. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.4.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
11. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.5.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_  
Sur 2 -

c. Equipped with a coating which is compatible with each waste stored in the area?

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# 2  
Sur 2 facility part  
res am 6/10/97

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so,

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]

Yes ☒ No ☐ N/A ☐ RMK# ☐

### CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]

Yes ☐ No ☐ N/A ☒ RMK# ☐

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]

Yes ☐ No ☐ N/A ☒ RMK# ☐

### CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?

Yes ☒ No ☐ N/A ☐ RMK# ☐

**LAND DISPOSAL RESTRICTION REQUIREMENTS**  
**PROHIBITION AGAINST DILUTION**

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] Yes X No (D) N/A \_\_\_ RMK# \_\_\_
- a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. To circumvent the effective date of a prohibition (e.g., to dilute a non-wastewater waste to a wastewater to avoid complying with the non-wastewater treatment standard)? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).

**GENERATOR REQUIREMENTS**

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. **For determinations based solely on knowledge of the waste:** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. **For determinations based upon analytical testing:**  
Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

4. Has the generator determined the correct treatability group for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)]

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. **For listed wastes which also exhibit a characteristic:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].

#### NOTIFICATION/CERTIFICATION

7. **For wastes that do not meet treatment standards:** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

If so, does the notice including the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

8. **For wastes that meet treatment standards:** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

#### STORAGE OF LAND DISPOSAL RESTRICTED WASTES

**NOTE:** The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

**NOTE:** The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36.(l)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. The identification of the contents? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. The date which accumulation began?

**NOTE:** A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

11. Are LDR wastes being stored at the facility for greater than one year? If so,

- a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

Yes   X   No      N/A      RMK#



# RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: U.S. DOE Portsmouth Gaseous Diffusion EPA ID#: OH7 890 008 983

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: Same  
(If different from above)

Telephone: 740-897-5010 Fax #: \_\_\_\_\_

Owner/Operator: \_\_\_\_\_  
(If different from above)

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: Ohio Zip: \_\_\_\_\_

Inspection Date(s): 6/17/2013 and 6/18/2013 Time(s): 7:30 am

Inspection Announced? Yes x NO If so, how much advance notice given? \_\_\_\_\_

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Kristi Wiehle	U.S. DOE	740-897-5020
	Chris Guilliams	Fluor-B&W Portsmouth, LLC	740-897-3863

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input type="checkbox"/> Large Quantity Generator (LQG)	<input checked="" type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil
	<input checked="" type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY  
NOTE TO THE INSPECTOR**

**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
**NOTE:** To convert from gallons to pounds: *Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.*

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**NOTE:** If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** Complete appropriate checklist for each unit.

**NOTE:** If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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26.	Does the generator keep records and documentation of:		
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:		
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

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EMERGENCY PROCEDURES		
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.		
PREPAREDNESS AND PREVENTION		
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
	a. Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS		
43.	Does the generator ensure that satellite accumulation area(s):	
	a. Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<p><i>NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.</i></p>					
<b>USE AND MANAGEMENT OF CONTAINERS IN &lt;90 DAY ACCUMULATION AREAS</b>					
45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
47.		Are hazardous wastes stored in containers which are:			
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<p><i>NOTE: Record location on process summary sheets, photograph the area, and record on facility map.</i></p>					
48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<p><i>NOTE: "Week" means 7 consecutive days per ORC§1.44(A).</i></p>					
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
50.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
51.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
52.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<p><i>NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.</i></p>					
53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

**PRE-TRANSPORT REQUIREMENTS**

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>





LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
<b>GENERAL REQUIREMENTS</b>		
1.	Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>PROHIBITIONS</b>		
2.	Did the LQUWH dispose of universal waste? [3745-273-31(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE PESTICIDES</b>		
9.	Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? [3745-273-33(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-34(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-34(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		
15.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-33(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(2)]	
	a. Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-33(C)(2)(a)&(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)&(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Ensure that employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-33(C)(2)(g)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-33(C)(2)(h)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the LQUWH: [3745-273-33(C)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-33(C)(3)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-33(C)(2)? [3745-273-33(C)(3)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-33(C)(4)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-33(C)(4)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-34(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-34(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE LAMPS		
21.	Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
22.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>		
23.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ACCUMULATION TIME		
24.	Is the waste accumulated for less than one year? [3745-273-35(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate.) [3745-273-35(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><b>NOTE: Accumulation is defined as date generated or date received from another handler.</b></p>		
25.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If yes, describe below:		
EMPLOYEE TRAINING		
26.	Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
27.	Are releases of universal waste and other residues immediately contained? [3745-273-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Is the material released characterized? [3745-273-37(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
<p><b>NOTE: If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.</b></p>		
30.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Is the handler aware of DOT requirements for packaging and shipping?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	If not, make aware of 40 CFR 171-180.	
32.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
33.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
34.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
35.	If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>TRACKING UNIVERSAL WASTE SHIPMENTS</b>		
36.	Are universal wastes received from another handler? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Does the record include the following:	
	a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Date received? [3745-273-39(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Is universal waste shipped to another handler? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Is a record of each shipment kept? [3745-273-39(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	Does the record include the following?	
	a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Date shipped? [3745-273-39(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Are records kept for three years? [3745-273-39(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EXPORTS</b>		
41.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
<b>GENERAL REQUIREMENTS</b>		
1.	Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>PROHIBITIONS</b>		
2.	Did the LQUWH dispose of universal waste? [3745-273-31(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)] (this change makes it like the SQUWH checklist)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)] (Added rule #)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
9.	Does the LQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages <u>closed</u> and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>only RT-847</i>
10.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>		
11.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME			
12.	Is the waste accumulated for less than one year? [3745-273-35(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-35(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>			
13.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If yes, describe below:		
EMPLOYEE TRAINING			
14.	Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES			
15.	Are releases of universal waste and other residues immediately contained? [3745-273-37(A)] (This now mirrors SQUWH checklist)		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Is the material released characterized? [3745-273-37(B)] (This now mirrors SQUWH checklist)		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(C)] (This now mirrors SQUWH checklist)		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS			
<i>NOTE: If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.</i>			
18.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Is the handler aware of DOT requirements for packaging and shipping?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If not, make aware of 40 CFR 171-180.		
20.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	Has the originating handler ever had an off-site shipment rejected by another handler of destination facility?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do one of the following: (This now mirrors SQUWH checklist)		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
23.	If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
TRACKING UNIVERSAL WASTE SHIPMENTS			
24.	Are universal wastes received from another handler? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

	a.	Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
25.	Does the record include the following:				
	a.	Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Date received? [3745-273-39(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
26.	Is universal waste shipped to another handler? If so:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
27.	Does the record include the following?				
	a.	Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Date shipped? [3745-273-39(B)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
28.	Are records kept for three years? [3745-273-39(C)(1)&(2)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>EXPORTS</b>					
29.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>





OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED				
1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11				
3.	Are the handler's batteries reclaimed other than through regeneration?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	If yes, does the handler:		
	i.	Generate, collect, and/or transport these batteries?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Store these batteries but is not the reclaimer?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Store these batteries before reclaiming them?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Not store these batteries before reclaiming them?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If the answer to any question 3ai through 3aiv is "yes", the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirement (e.g., general or interim standard facilities), unless when it meets the conditions in question 4 below. Complete other appropriate checklists (e.g., LDR, TSD).				
4.	If the handler that does NOT have a permit and that reclaims batteries received from off-site other than through regeneration, does the handler:			
	a.	Store the batteries less than 72 hours prior to entering them into the reclaiming process?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Comply with the applicable requirements in 3745-51-06(C)(3) to (C)(3)(b)?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Has the handler adequately evaluated all waste generated at their facility?			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID Number]

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USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS		
NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.		
<b>PROHIBITIONS</b>		
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: For example, used oil contaminated scrap metal stored in a pile.		
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).		
<b>GENERATOR STANDARDS</b>		
4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.		
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.		
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>ON-SITE BURNING IN SPACE HEATER</b>		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

#### GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

#### COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

NOV 07 2014

Mr. William E. Murphie  
Manager  
U.S. Department of Energy  
Portsmouth/Paducah Project Office  
1017 Majestic Drive, Suite 200  
Lexington, Kentucky 40513

REPLY TO THE ATTENTION OF:

Mr. Dennis J. Carr  
Site Project Director  
Fluor-B&W Portsmouth, LLC  
Post Office Box 548  
Piketon, Ohio 45661

Re: U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio  
OH7 890 008 983

Dear Messrs. Murphie and Carr:

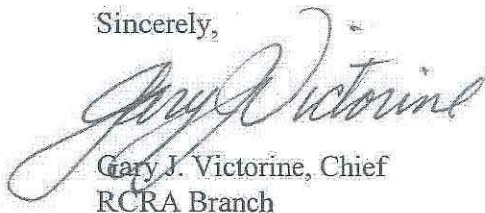
On September 19, 2014 the U.S. Environmental Protection Agency issued the U.S. Department of Energy (DOE) Portsmouth Gaseous Diffusion Plant, a Notice of Violation (NOV) which identified violations of the Ohio Administrative Code at the Piketon, Ohio facility. Subsequent to our NOV, you submitted information regarding the identified violations in a letter dated October 21, 2014.

This letter is to inform you that EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by EPA and the Ohio Environmental Protection Agency (Ohio EPA) in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

cc: Melody Stewart, Ohio EPA (melody.stewart@epa.ohio.gov)  
Bruce McCoy, Ohio EPA (bruce.mccoy@epa.ohio.gov)







## Department of Energy

Portsmouth/Paducah Project Office  
1017 Majestic Drive, Suite 200  
Lexington, Kentucky 40513  
(859) 219-4000

OCT 21 2014

Mr. Gary J. Victorine, Chief  
RCRA Branch  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

PPPO-03-2610254-15

Dear Mr. Victorine:

**RESPONSE TO NOTICE OF VIOLATION RESOURCE CONSERVATION AND  
RECOVERY ACT COMPLIANCE INSPECTION – U.S. DEPARTMENT OF ENERGY  
PORTSMOUTH GASEOUS DIFFUSION PLANT, PIKETON, OHIO; OH7890008983**

Reference: Letter from G. Victorine to W. Murphie and D. Carr, "Notice of Violation RCRA Compliance Inspection – U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio OH7 890 008 983," dated September 19, 2014

The United States Department of Energy (DOE) and its Decontamination and Decommissioning (D&D) contractor Fluor-B&W Portsmouth, LLC (FBP) have reviewed the above referenced letter from the United States Environmental Protection Agency (EPA). The letter alleges two violations were identified during the Resource Conservation and Recovery Act (RCRA) Compliance Evaluation performed by Walt Francis, Environmental Scientist, U.S. EPA, from March 24 through March 26, 2014. This letter provides the response to the notice of violation as requested in your September 19, 2014 Notice of Violation (NOV) which was received on September 22, 2014.

The first violation alleges that DOE and FBP were in violation of Ohio Administrative Code (OAC) 3745-52-20(B)[40 CFR § 262.20] and condition B.24 of the Portsmouth Facility RCRA permit. The violation also states that the generator who offers hazardous waste for transportation for off-site treatment, storage, or disposal must prepare a manifest on U.S. EPA form 8700-22 according to the instructions in the appendix to 40 CFR Part 262. At the time of the inspection the Hazardous Waste Report Management Method Code item 19 of the Universal Hazardous Waste Manifest (U.S. EPA Form 8700-22) had not been completed for manifests 001596125 GBF, 001596126 GBF, 001596128 GBF, 001596129 GBF, 001596140 GBF, 001596141 GBF, 001596142 GBF, and 001596144 GBF and therefore, DOE and FBP were in violation of the cited regulations and permit condition.

According to the instructions for completing form 8700-22 provided in the cited appendix to 40 CFR 262, "the Hazardous Waste Report Management Method code is to be entered by the first treatment, storage, for disposal facility (TSDSF) that receives the waste..." The regulations





cited for the alleged violation do not indicate a specific obligation on the part of the generator to ensure that item 19 is completed upon receiving the returned manifest from the receiving TSDF. Based on a review of the instructions for completing form 8700-22 and the cited regulations, it is the obligation of the receipt facility to complete item 19, not the generator who initiated the shipment as the generator does not control the TSDF's treatment planning for the waste. There is also no specified time frame in either the instructions or the regulations for when the receiving TSDF must complete information for item 19.

Additionally, completed manifest including the codes in item 19 are provided by the receiving TSDF once treatment/disposal is completed. The completed manifest is provided to the generator by the managing TSDF along with a certificate of disposal/management for each waste shipment. Completeness of waste management records is key to the program effectiveness, therefore verification and/or follow-up to ensure item 19 codes are provided by the TSDF is done by the Portsmouth Gaseous Diffusion Plant (PORTS) for all manifests. In this case, the certificates of disposal/management were received after the March 2014 RCRA Compliance Evaluation. The certificates of disposal/management for these manifests were received during the period April 22, 2014 to May 21, 2014.

Completed manifests, including item 19, for the manifest numbers cited in the NOV have been received by FBP and review of other manifest records did not identify additional missing entries.

The second alleged violation was for failure to include required information in the Biennial Hazardous Waste Report required by OAC 3745-52-41. Specifically, volumes of waste that were accumulated in the X-710 Laboratory prior to undergoing elementary neutralization were not included in the 2013 Biennial Report. This issue was also identified during an Ohio EPA quarterly review of compliance with the RCRA Part B Permit on May 21, 2014. Ohio EPA issued an NOV for this issue on May 30, 2014. FBP submitted a revision to the Hazardous Waste Report for 2013 on June 3, 2014 in response to the Ohio EPA NOV. A copy of the revised Hazardous Waste Report for 2013 is enclosed. The report identifies 871 pounds of RCRA Aqueous Liquids (PW-203) as being neutralized on-site (Management Method H121).

As requested in your letter, DOE and FBP provide the following table which lists the rooms and labs in the X-710 Laboratory Facility that generate and neutralize hazardous waste prior to discharging the neutralized waste to the sanitary sewer system. Neutralization is performed on excess (unused) sample and analytical waste which are known only to be RCRA hazardous for corrosivity by one or a combination of the following: process knowledge, analytical data, analytical method, matrix, etc. For example, excess samples from National Pollutant Discharge Elimination System (NPDES) outfalls that were preserved for analysis with an acid have long standing sample analytical data supporting the RCRA hazard is only corrosivity for the acid added.

Room #	Lab	General Description
154	Water Lab	Weak sulfuric acid waste and Unused sample portions, QC samples (blanks, rinseates, etc) D002
203	Return Chain of Custody	Unused sample portions, QC samples (blanks, rinseates, etc) D002



Room #	Lab	General Description
223	Environmental Radiochemistry	Unused sample portions, QC samples (blanks, rinseates, etc) D002
214	Nickel Project	Acid traps D002
218	Spectroscopy	Instrument discharge which is up to 5% HNO <sub>3</sub> and 5%HCl D002
245	Radiochemistry Prep	3M to 6M HNO <sub>3</sub> waste, unused sample portions QC samples (blanks, rinseates, etc.) D002
254	Environmental and Industrial Hygiene	Wet Chem analytical waste, Unused sample portions, QC samples (blanks, rinseates, etc) D002
262	Radiochemistry Prep	Unused sample portions, QC samples (blanks, rinseates, etc) D002
281	Spectroscopy Prep	Unused sample portions, QC samples (blanks, rinseates, etc) D002
285	Environmental Radiochemistry	Unused sample portions, QC samples (blanks, rinseates, etc) D002

The process for tracking waste activities, developing and issuing the FBP Portsmouth Hazardous Waste Report has been updated to include this neutralization information in all future submittals.

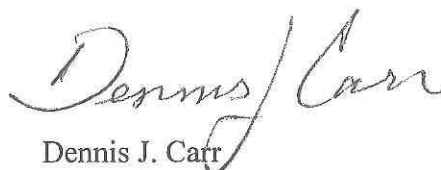
The U.S. EPA letter also raises a concern that that X-710 Laboratory staff do not receive hazardous waste training. Subsequent to the inspection, it was verified that the laboratory staff do receive hazardous waste training even though it is not specifically required by RCRA regulations.

Should you need any additional information from DOE, please contact Kristi Wiehle at (740) 897-5020; from FBP, please contact Frank Johnston at (740) 897-2119.

Sincerely,



William E. Murphie  
Manager  
Portsmouth/Paducah Project Office



Dennis J. Carr  
Site Project Director  
Fluor B&W Portsmouth, LLC

Enclosure:

Revised Hazardous Waste Report for 2013



cc w/enclosure:

R. Edwards, PPPO/LEX

J. Bradburne, PPPO/PORTS

B. Gawthorp, PPPO/LEX

J. Sherman, PPPO/LEX

J. Lilly, PPPO/PORTS

M. Wolfe, PPPO/PORTS

K. Wiehle, PPPO/PORTS

A. Lawson, PPPO/PORTS

R. Bell, PPPO/LEX

R. Richmond, RSI/PORTS

F. Johnston, FBP/PORTS

J. Sferra, Ohio EPA

RMDC@wems-llc.com (RCRA Administrative Record)

RMDC@fbports.com

ETS.support@lex.doe.gov





# Ohio Environmental Protection Agency

## Division of Materials and Waste Management

### Hazardous Waste Report for 2013

#### Site Identification Form

EPA ID: OH7890008983

Facility: US DOE Portsmouth Gaseous Diffusion Plant

Location: 3930 US Route 23 South  
Piketon, OH 45661

NAICS Codes: 23799

Site County Name: Pike

Site Land Type: Federal

Source Indicator: eBusiness Center

#### Reason for Submittal:

Subsequent Notif: Y

Report: Y

#### Total Pounds:

Generated: 25,334.00

Shipped: 138,526.00

#### Contact Information

Contact Name: Robert Owens

Contact Address Line 1: 3930 US Route 23 South

Contact Address Line 2:

Contact City/State: Piketon, OH

Contact Country: USA

Contact Zip: 45661

Contact Title: Waste Management Specialist III

Contact Phone: (740) 897-3072

Contact Fax:

Contact Email: robert.owens@fbports.com

#### Hazardous Waste Activities

Report Generator Status: LQG

Generator Status (at time of certification): LQG

Short-term Generator: N

Importer: N

Mixed Waste Generator: Y

Transporter: N

Transfer Facility: N

TSD: Y

Recycler: N

72 Hour Recycler: N

Small Burner Exemption: N

Furnace Exemption: N

UIC: N

Receives HW from Off-site: N

#### Used Oil Activities

Transporter: N

Transfer Facility: N

Processor: N

Refiner: N

Burner: N

Marketer Direct: N

Marketer First: N

#### Eligible Academic Entities with Laboratories

Opting Into: N

- College or University: N

- Teaching Hospital: N

- Non-profit Research Institute: N

Withdrawn From: N

#### Universal Waste Activities

Large Qty Handler: Y

Batteries: Y

Pesticides: N

Mercury Containing Equipment: Y

Lamps: Y

Destination Facility: N

Waste Codes: D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D018 D022 D035 D038 D040 F001 F002 F003 F005 P073 U080 U117 U121 U134 U154 U159 U210 U226

#### Site ID Comments:

The following materials were recycled during CY2013: 21,153 pounds (net wt.) of Universal Wastes and electronic devices including scrap batteries, circuit boards, fluorescent and incandescent light bulbs and electronic equipment.

#### Owner/Operator Information

##### Owners

US Department of Energy

3930 US Route 23 South

Piketon, OH 45661

(740) 897-5020

Date Originated: 01/01/1953

##### Operators

Fluor-B&W Portsmouth, LLC

3930 US Route 23 South

Piketon, OH 45661

(740) 897-3860

Date Originated: 03/29/2011

Certified by Dennis Carr, Deputy Program Manager, on 02/13/2014

## Form GM - Generation and Management

**Waste:** Incinerator Ash (705-10)

Page: 1

**Source Code:** G42

**Waste Form:** W303

**Waste Minimization Code:** X

**Waste Code(s):** D005 D006 D008

**Previous Year Generated:** 3990

**Current Year Generated:** 0

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

### Off-Site Shipment Information

Facility	Management Method	Quantity Shipped
TNR000005397	H110	1143

### Waste Remaining On-site as of December 31

Greater than 90 days: Y

- Generated Current Year: N

- Generated Prior Year: Y

Inactive Disposal: N

### On-Site Storage & Disposal System Information

Handling Code	Amount	Unit of Measure	Density
S01	2847	P	--

**Comment:**

**Waste:** Waste Acids and Bases (710-2)

Page: 2

**Source Code:** G22

**Waste Form:** W105

**Waste Minimization Code:** X

**Waste Code(s):** D002 D008 D009

**Previous Year Generated:** 240

**Current Year Generated:** 0

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: N

### Waste Remaining On-site as of December 31

Greater than 90 days: Y

- Generated Current Year: N

- Generated Prior Year: Y

Inactive Disposal: N

### On-Site Storage & Disposal System Information

Handling Code	Amount	Unit of Measure	Density
S01	240	P	--

**Comment:**

**Waste:** Decontamination Waste Solids (CASC-6)

Page: 3

**Source Code:** G11

**Waste Form:** W319

**Waste Minimization Code:** X

**Waste Code(s):** D004 D006 D007 D008 D009

**Previous Year Generated:** 22506

**Current Year Generated:** 0

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

### Off-Site Shipment Information

Facility	Management Method	Quantity Shipped
TNR000005397	H110	12221
TXD988088464	H132	1255
UTD982598898	H132	1069
TND982109142	H129	182



**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: N  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	7779	P	--

**Comment:** This material was assigned waste form code W319, and consists of miscellaneous inorganic process residues and other solids. A quantity of 182 lbs was shipped to DSSI for processing, stabilization and RCRA Permitted Landfill disposal.

**Waste:** Soils (ER-3)

**Source Code:** G42  
**Waste Form:** W301  
**Waste Minimization Code:** X  
**Waste Code(s):** F001

**Previous Year Generated:** 804  
**Current Year Generated:** 0  
**Unit of Measure:** Pounds  
**Density:**

**Page:** 4

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: N

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: N  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	804	P	--

**Comment:**

**Waste:** Surface Water (ER-7)

**Source Code:** G42  
**Waste Form:** W101  
**Waste Minimization Code:** X  
**Waste Code(s):** D005 D006

**Previous Year Generated:** 9  
**Current Year Generated:** 0  
**Unit of Measure:** Pounds  
**Density:**

**Page:** 5

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: N

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: N  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	9	P	--

**Comment:**

**Waste:** RCRA Debris (PW-201)

**Source Code:** G42  
**Waste Form:** W002  
**Waste Minimization Code:** X  
**Waste Code(s):** D002 D004 D005 D006 D007 D008 D009 D010 D011 D018 F001 F002 F003

**Previous Year Generated:** 27356  
**Current Year Generated:** 4908  
**Unit of Measure:** Pounds  
**Density:**

**Page:** 6

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
TNR000005397	H110	1657
UTD982598898	H132	17686

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	12921	P	--

**Comment:** A quantity of 17076 lbs of waste under PW-201 was shipped to Energy Solutions Clive UT facility for treatment and disposal. An additional quantity of 610 lbs was shipped to ES Clive as LDR Compliant RCRA Debris.

**Waste:** Mixed Waste Soils (PW-202)

**Page:** 7

**Source Code:** G49  
**Waste Form:** W301  
**Waste Minimization Code:** X  
**Waste Code(s):** F001

**Previous Year Generated:** 2241  
**Current Year Generated:** 9  
**Unit of Measure:** Pounds  
**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: N

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	2250	P	--

**Comment:** Material in this group was assigned source code G49. It was generated during sampling of contaminated soil.

**Waste:** RCRA Aqueous Liquids (PW-203)

**Page:** 8

**Source Code:** G09  
**Waste Form:** W101  
**Waste Minimization Code:** A  
**Waste Code(s):** D001 D002 D004 D006 D007 D008 D009 D010 D040  
F001 F002 F003

**Previous Year Generated:** 6977  
**Current Year Generated:** 4937  
**Unit of Measure:** Pounds  
**Density:**

Waste treated, disposed of, or recycled on-site?: Y

**On-Site Management Information**

Management Method	Quantity Treated, Disposed or Recycled
H121	871

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
TND982109142	H040	844

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	10199	P	--

**Comment:** Wastes in this group are generated primarily by on-site lab processes. 104.4 gallons (871 lbs) of D002 acidic lab wastewater was processed by elementary neutralization, then discharged to sanitary sewer system and NPDES permitted outfall.

**Waste:** RCRA Combustible Liquids (PW-204)

**Page:** 9

**Source Code:** G09

**Waste Form:** W219

**Waste Minimization Code:** A

**Waste Code(s):** D001 D002 D006 D007 D008 D009 D010 D012 D018 D022 D038 F001 F002 F003 F005 P073

**Previous Year Generated:** 4604

**Current Year Generated:** 1274

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
TND982109142	H040	1412

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y

- Generated Current Year: Y

- Generated Prior Year: Y

Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	4466	P	--

**Comment:** Wastes in this group are generated primarily by on-site laboratory processes and contain various organic liquids.

**Waste:** RCRA Sludges (PW-205)

**Page:** 10

**Source Code:** G23

**Waste Form:** W504

**Waste Minimization Code:** A

**Waste Code(s):** D002 D004 D006 D007 D008 D010 F001

**Previous Year Generated:** 153276

**Current Year Generated:** 0

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
UTD982598898	H132	46834
TNR000005397	H110	20011

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y

- Generated Current Year: N

- Generated Prior Year: Y

Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	86431	P	--

**Comment:**

**Waste:** RCRA Process Residues Solids (PW-206)

**Page:** 11

**Source Code:** G13

**Waste Form:** W307

**Waste Minimization Code:** X

**Waste Code(s):** D004 D006 D007 D008 D009 D010 D011 F001 F002 F003

**Previous Year Generated:** 18147

**Current Year Generated:** 122

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
TNR000005397	H110	4092
UTD982598898	H132	1240
TXD988088464	H132	2494

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	10443	P	--

**Comment:** Part of the reduction in the quantity remaining in on-site storage is due to removing the Ash and Gunk waste inventory from over-pack shipping containers. Package weights are lower because of the reduction in tare weights.

**Waste:** RCRA Spent Activated Carbon (PW-207)

Page: 12

**Source Code:** G49  
**Waste Form:** W310  
**Waste Minimization Code:** A  
**Waste Code(s):** F001

**Previous Year Generated:** 14461  
**Current Year Generated:** 0  
**Unit of Measure:** Pounds  
**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
TNR000005397	H129	10560

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: N  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	3901	P	--

**Comment:** Spent Carbon from on-site groundwater pump and treat facilities was assigned source code G49 (Other Remediation). Management method H129 Other Treatment refers to Vacuum Thermal Desorption followed by off-site LDR-compliant burial.

**Waste:** RCRA Labpacks (PW-209)

Page: 13

**Source Code:** G11  
**Waste Form:** W001  
**Waste Minimization Code:** X  
**Waste Code(s):** D006 D007 D008 D009

**Previous Year Generated:** 0  
**Current Year Generated:** 27  
**Unit of Measure:** Pounds  
**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: N

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: N  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	27	P	--

**Comment:**

Waste: RCRA Containerized Gases (PW-210)

Page: 14

Source Code: G11  
Waste Form: W801  
Waste Minimization Code: X  
Waste Code(s): D001

Previous Year Generated: 42  
Current Year Generated: 0  
Unit of Measure: Pounds  
Density:

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
TND982109142	H040	42

**Waste Remaining On-site as of December 31**

Greater than 90 days: N  
- Generated Current Year: N  
- Generated Prior Year: N  
Inactive Disposal: N

Comment:

Waste: Non-Rad RCRA Combustible Liquids (PW-502)

Page: 15

Source Code: G06  
Waste Form: W211  
Waste Minimization Code: X  
Waste Code(s): D001 D002 D018 D022 D035 D040 F003 F005 U117  
U134 U154 U159

Previous Year Generated: 1205  
Current Year Generated: 2432  
Unit of Measure: Pounds  
Density:

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
MID980991566	H050	2497

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: Y  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	1140	P	--

Comment:

Waste: Non-Rad Other RCRA Hazardous Waste (PW-503)

Page: 16

Source Code: G07  
Waste Form: W409  
Waste Minimization Code: X  
Waste Code(s): D001 D002 D003 D006 D007 D008 D009 D011 D018  
D035 D040 F005 U080 U121 U210 U226

Previous Year Generated: 2119  
Current Year Generated: 2160  
Unit of Measure: Pounds  
Density:

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
OHD048415665	H040	60
MID980991566	H050	3762

**Waste Remaining On-site as of December 31**

Greater than 90 days: Y  
- Generated Current Year: Y  
- Generated Prior Year: N  
Inactive Disposal: N

**On-Site Storage & Disposal System Information**

Handling Code	Amount	Unit of Measure	Density
S01	457	P	--

**Comment:** PW-503 includes rags and gloves with dried paint, aerosol can wastes, soil sampling waste and other miscellaneous wastes that were determined non-radioactive.

**Waste:** Non-Rad RCRA/TSCA Wastes (PW-504)

**Page:** 17

**Source Code:** G19

**Waste Form:** W307

**Waste Minimization Code:** X

**Waste Code(s):** D007 D010

**Previous Year Generated:** 0

**Current Year Generated:** 9465

**Unit of Measure:** Pounds

**Density:**

Waste treated, disposed of, or recycled on-site?: N

Was waste shipped off-site in reporting year: Y

**Off-Site Shipment Information**

Facility	Management Method	Quantity Shipped
ALD000622464	H132	1065
ALD000622464	H040	8400

**Waste Remaining On-site as of December 31**

Greater than 90 days: N  
- Generated Current Year: N  
- Generated Prior Year: N  
Inactive Disposal: N

**Comment:** This waste consisted of 2 PCB electrical transformers with dielectric fluids containing D010 selenium, and a bulk shipping container of scrap metal ductwork with D007 chromium and PCBs.

## Form OI - Off-site Transporter and Receiving Facility Information

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**EPA ID:** ALD000622464

**Transporter:** N

**Address**

36964 AL HWY 17 N  
EMELLE, AL 35459

**Name:** Chemical Waste Management

**Receiving Facility:** Y

**EPA ID:** COR000005389

**Transporter:** Y

**Address**

9850 Havana St  
Henderson, CO 80640

**Name:** Cast Transportation

**Receiving Facility:** N

**EPA ID:** KYR000033241

**Transporter:** Y

**Address**

1017 KY 223  
Flat Lick, KY 40935

**Name:** Hubbard Trucking

**Receiving Facility:** N

**EPA ID:** MID980991566

**Transporter:** N

**Address**

1923 FREDERICK STREET  
DETROIT, MI 49211

**Name:** EQ Detroit Inc

**Receiving Facility:** Y

**EPA ID:** MOD095038998

**Transporter:** Y

**Address**

8141 E 7TH ST  
JOPLIN, MO 64801

**Name:** Bed Rock Inc. DBA Tri State Motor Co.

**Receiving Facility:** N

**EPA ID:** MOR000501973

**Transporter:** Y

**Address**

302 Thunder Rd  
Duenweg, MO 64841

**Name:** R & R Trucking Inc

**Receiving Facility:** N

**EPA ID:** MOR000501981

**Transporter:** Y

**Address**

302A Thunder Rd  
Duenweg, MO 64841

**Name:** AATCO

**Receiving Facility:** N

**EPA ID:** OHD048415665

**Transporter:** N

**Address**

36790 GILES ROAD  
GRAFTON, OH 44044

**Name:** Ross Incineration Services, Inc.

**Receiving Facility:** Y

**EPA ID:** OKD981588791

**Transporter:** Y

**Address**

1630 DIESEL AVE  
MCALESTER, OK 74501

**Name:** TRIAD TRANSPORT INC.

**Receiving Facility:** N

**EPA ID:** TND982109142

**Transporter:** N

**Address**

657 GALLAHER ROAD  
KINGSTON, TN 37763

**Name:** Diversified Scientific Services Inc.

**Receiving Facility:** Y

**EPA ID:** TNR000005397

**Transporter:** N

**Address**

East Tennessee Technology Park  
Oak Ridge, TN 37830

**Name:** East Tennessee Materials and Energy Corp

**Receiving Facility:** Y

**EPA ID:** TNR000011247

**Transporter:** Y

**Address**

2530 Mitchell St  
Knoxville, TN 37917

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**Name:** Specialty Transport Inc

**Receiving Facility:** N

**EPA ID:** TXD988088464

**Transporter:** N

**Address**

9998 WEST STATE HIGHWAY 176  
ANDREWS, TX 79714

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**Name:** Waste Control Specialists

**Receiving Facility:** Y

**EPA ID:** UTD982598898

**Transporter:** N

**Address**

1 mi S of Clive RR Site  
Grantsville, UT 84101

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**Name:** Energy Solutions LLC

**Receiving Facility:** Y